COMMONWEALTH OF KENTUCKY BEFORE THE PUBLIC SERVICE COMMISSION

PETITION OF NPCR, INC.,)	CASE NO. 2003-00143
D/B/A NEXTEL PARTNERS FOR)	
DESIGNATION AS AN ELIGIBLE)	
TELECOMMUNICATIONS CARRIER IN)	
THE COMMONWEALTH OF KENTUCKY)	

STATE OF WASHINGTON)
) ss
COUNTY OF KING)

Gregory Diamond, being first duly sworn on oath, states as follows:

- 1. I am an attorney for Nextel Partners, Inc. and its subsidiaries, including the Petitioner in this proceeding NPCR, Inc. ("Nextel Partners"). In this capacity I have personal knowledge of the matters set forth in this affidavit and am authorized to make this affidavit on behalf of Nextel Partners.
- 2. Nextel Partners is requesting confidential treatment for its proposed filing of the following exhibits: (1) a map depicting its cell site locations in and around the areas served by ITG companies; (2) maps showing anticipated signal propagation following 2004 network expansion projects.
 - 3. These exhibits contain proprietary information that would aid competitors of

- 4. The specific exhibits Nextel Partners proposes to file would reveal proprietary information regarding Nextel Partners' network infrastructure and buildout plans. This information constitutes a trade secret because it is commercial information that, if disclosed, could cause substantial competitive harm to Nextel Partners. This information is either not publicly available or not generally available in this format. It would be difficult (or impossible) for someone to discover this information from other sources. If this information were available to competitors in this format, they could use it to the competitive detriment of Nextel Partners.
- 5. Unlike incumbent telephone companies who are typically subject to a high degree of regulation, wireless providers like Nextel Partners operate in a highly competitive marketplace where such proprietary information is closely guarded to ensure it is not disclosed to competitors.
- 6. This information is not generally disclosed to non-management employees of Nextel Partners, and is protected internally by Nextel Partners as proprietary information.

FURTHER YOUR AFFIANT SAYETH NOT.

GREGORY DIAMOND

Subscribed and sworn to before me this *izb* day of February, 2004.

Poller & Sen Q Notary Public